UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

DMITRIY SHIROKOV, on behalf of himself and all others similarly situated,)))
Plaintiff,))
V.))
DUNLAP, GRUBB & WEAVER PLLC; US COPYRIGHT GROUP; THOMAS DUNLAP; NICHOLAS KURTZ; GUARDALEY, LIMITED; and ACHTE/NEUNTE Boll Kino Beteiligungs Gmbh & Co KG, Defendants.	Civ. A. No.1:10-cv-12043-GAO))))))

PLAINTIFF'S MOTION FOR CLASS CERTIFICATION

Plaintiff Dmitriy Shirokov, on behalf of himself and all others similarly situated, moves pursuant to Fed. R. Civ. P. 23(a) and 23(b)(3) for class certification. The proposed Class consists of:

- a) a class of all 4,577 persons (the "proposed Class") whom Defendants allege infringed the Achte copyright prior to May 12, 2010, the date on which Defendants filed their Complaint;
- b) a subclass of all 917 persons ("Subclass I") whom Defendants allege infringed the Achte copyright prior to its claimed date of publication, November 24, 2009; and
- c) a subclass of all 3,644 persons ("Subclass II") whom Defendants allege infringed the Achte copyright prior to its effective date of registration, January 19, 2010.
- 1. Plaintiff brought this action on behalf of himself and the proposed class defined above to seek relief for Defendants' settlement fraud and extortion.
- 2. As demonstrated in the supporting memorandum of law, the proposed class meets the requirements of Rules 23(a) and 23(b)(3).
- 3. In addition to the memorandum, Plaintiff relies on the following documents submitted herewith in support of this motion:
 - a. Declaration of Jason E. Sweet in Support of Plaintiff's Motion for Class Certification.

WHEREFORE, Plaintiff respectfully requests that the Court grant his motion and certify the proposed class.

Dated: March 26, 2012

Respectfully submitted, Dmitriy Shirokov

/s/ Jason Sweet

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Co-Counsel for Plaintiff and Proposed Class

CERTIFICATE OF SERVICE

I, Jason Sweet, hereby certify that on this March 26, 2012, I electronically filed the foregoing Plaintiff's Motion for Class Certification, by using the ECF system, thereby causing a true copy of said documents to be served upon counsel of record for each Defendant identified on the Notice of Electronic Filing.

/s/ Jason Sweet